

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

AARON CAIN MCKNIGHT, et al.

Defendants,

-and-

**ACCELERATED VENTURE PARTNERS,
LLC, et al.**

Relief Defendants.

Case No. 3:23-cv-00641-L

Jury Trial Demanded

**PLAINTIFF’S MOTION TO ENTER JUDGMENT AGAINST DEFENDANT
SHERRY REBEKKA SIMS**

Plaintiff Securities and Exchange Commission (“SEC”) files this Motion to Enter Judgment against Defendant Sherry Rebekka Sims (“Sims”), and respectfully shows the Court as follows:

1. The SEC filed this civil action on March 23, 2023, alleging violations of the federal securities laws. *See* Dkt. No. 1.
2. The SEC has reached a bifurcated settlement with Defendant Sims. Pursuant to the settlement, Defendant Sims executed the Consent attached hereto as Exhibit A and, without admitting or denying the allegations in the Complaint, agreed to entry of the proposed Judgment submitted herewith (the “Judgment”), which, among other things:

- a. permanently restrains and enjoins Defendant from violation of Section 17(a) of the Securities Act of 1933 (“Securities Act”) [15 U.S.C. § 77q(a)], and Section 10(b) of the Securities Exchange Act of 1934 (“Exchange Act”) [15 U.S.C. § 78j(b)] and Rule 10b-5 thereunder [17 C.F.R. § 240.10b-5];
- b. permanently restrains and enjoins Defendant from directly or indirectly, including, but not limited to, through any entity owned or controlled by Defendant, (i) soliciting any person or entity to purchase or sell any security or (ii) offering, issuing, or writing surety bonds or other guarantees in connection with any purchase or sale of a security, provided, however, that such injunction shall not prevent Defendant from purchasing or selling securities for her own personal account; and
- c. prohibits Defendant from acting as an officer or director of any issuer that has a class of securities registered pursuant to Section 12 of the Exchange Act [15 U.S.C. § 78l] or that is required to file reports pursuant to Section 15(d) of the Exchange Act [15 U.S.C. § 78o(d)].

3. Pursuant to the Consent, Defendant Sims agreed that the SEC may present the proposed Judgment to the Court for signature and entry without further notice.

4. The SEC respectfully moves the Court to enter the proposed Judgment.

For all of the foregoing reasons, the SEC respectfully requests that the Court grant this Motion, enter the Judgment submitted herewith, and grant Plaintiff such other or further relief to which it is justly entitled.

Dated: March 24, 2023

Respectfully submitted,

/s/ Anna O. Area

Anna O. Area

Application for Admission *pro hac vice* pending

District of Columbia Bar No. 987572

Trial Counsel

U.S. SECURITIES AND EXCHANGE COMMISSION

100 F Street, N.E.

Washington, D.C. 20549-5977

Telephone: (202) 551-6417

areaa@sec.gov

David Reece

Local Counsel

Texas Bar No. 24002810

Trial Counsel

U.S. SECURITIES AND EXCHANGE COMMISSION

Burnett Plaza, Suite 1900

801 Cherry Street, Unit 18

Fort Worth, TX 76102

Telephone: (817) 978-6476

Facsimile: (817) 978-4927

reeced@sec.gov

Attorneys for Plaintiff

Of Counsel

Jason Anthony

Michael Flanagan

U.S. SECURITIES AND EXCHANGE COMMISSION

Division of Enforcement

100 F Street, N.E.

Washington, DC 20549-5977

CERTIFICATE OF CONFERENCE

Pursuant to the attached Consent, Defendant Sims agrees that the SEC may, without further notice, present the Judgment to the Court for entry. *See* Exhibit A at ¶¶ 1 – 2.

/s/ Anna O. Area
Anna O. Area

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed electronically on March 24, 2023, with the Clerk of the Court using the CM/ECF system, a copy was emailed to counsel for Defendants Sims, Miller, and Frost & Miller, LLP, and a copy was emailed to unrepresented Relief Defendants Accelerated Venture Partners, LLC, and Timothy Neher. All other Defendants will be served in accordance with Fed. R. Civ. P. 5(b).

/s/ Anna O. Area
Anna O. Area